



1 Laurence M. Rosen, pursuant to 28 U.S.C. § 1746, declares:

2 1. I am the Managing Attorney of The Rosen Law Firm, P.A., lead  
3 counsel to Lead Plaintiffs in this action. I make this declaration in support of  
4 Lead Plaintiffs' ex parte application for an extension of time to file their amended  
5 complaint.

6 2. Substantially all of the operations of China Finance Online Co., Ltd.,  
7 take place in the People's Republic of China ("China"). Upon appointment, Lead  
8 Plaintiffs retained a China-based investigator.

9 3. The week of October 1-7 is a national holiday in China. Lead  
10 Plaintiffs' investigator has informed Lead Plaintiffs that it will be difficult if not  
11 impossible to conduct any investigation during this holiday, meaning that any  
12 investigation would have to be complete before September 30, 2015.

13 4. Lead Plaintiffs do not believe it will be possible to complete an  
14 adequate investigation before September 30.

15 5. The current deadline to file the amended complaint is October 9,  
16 2015. Plaintiffs request a one week two day extension to October 18, 2015. This  
17 is the first request for an extension of time to file an amended complaint, though  
18 the Court previously granted in part Plaintiffs' application for a briefing schedule  
19 on their amended complaint and Defendants' response thereto.

20 6. I provided a copy of this Application to defendant China Finance  
21 Online, Ltd., by sending a copy via Federal Express overnight to their registered  
22 agent for service of process, Corporate Agents, Inc., 2711 Centerville Road,  
23 Wilmington, DE, 19808.

24 7. No defendant has appeared, and to the best of my knowledge, no  
25 counsel for any defendant in this action has contacted my firm.

1 I declare under penalty of perjury that the foregoing is true and correct.

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5 Dated: September 21, 2015 Respectfully submitted,

6 **THE ROSEN LAW FIRM, P.A.**

7 /s/ Laurence M. Rosen  
8 Laurence M. Rosen, Esq. (SBN 219683)  
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14 Lead Counsel for Plaintiffs

15 And

16 **GOLDBERG LAW PC**  
17 Michael Goldberg, Esq. (SBN 188689)  
18 13650 Marina Pointe Dr. Suite 1404  
19 Marina Del Rey, CA 90292  
20 Phone: 1800-977-7401  
21 Fax: 1800-536-0065

22 Additional Counsel for Plaintiffs  
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**CERTIFICATE OF SERVICE**

I, Laurence M. Rosen, hereby declare under penalty of perjury as follows:

I am the managing attorney of the Rosen Law Firm, P.A., with offices at 355 South Grand Avenue, Suite 2450, Los Angeles, CA 90071. I am over the age of eighteen.

On September 21, 2015, I electronically filed the following **DECLARATION OF LAURENCE M. ROSEN IN SUPPORT OF *EX PARTE* APPLICATION FOR EXTENSION OF TIME TO FILE AMENDED COMPLAINT** with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on September 21, 2015.

/s/ Laurence M. Rosen  
Laurence M. Rosen